RETURN DATE: APRIL 11, 2017 : SUPERIOR COURT

ST. JOHNS ROMAN CATHOLIC CHURCH : J.D. OF STAMFORD/NORWALK

OF STAMFORD CONNECTICUT

V. : AT STAMFORD

CITY OF STAMFORD : FEBRUARY 15, 2017

<u>COMPLAINT</u>

FIRST COUNT (Quiet Title C.G.S. § 47-31)

- 1. Plaintiff St. Johns Roman Catholic Church of Stamford Connecticut is a Connecticut corporation with a principal place of business located at 279 Atlantic Street, Stamford, Connecticut.
- 2. Plaintiff St. Johns Roman Catholic Church of Stamford Connecticut is and, at all relevant times herein, was the absolute owner in fee simple of a certain parcel of land located in the City of Stamford. That parcel is commonly known as 279 Atlantic Street in the City of Stamford (hereinafter "the Property").
 - 3. The plaintiff is and, at all relevant times, was in possession of the Property.
- 4. The plaintiff acquired title to the Property by virtue of a series of deeds, as follows:
 - a. Deed dated June 24, 1874 and recorded at Volume 51, Page 484 of the Land Records of the City of Stamford;
 - b. Deed dated September 30, 1875 and recorded at Volume 52, Page 680 of the
 Land Records of the City of Stamford;
 - c. Deed dated March 31, 1886 and recorded at Volume 66, Page 3 of the Land
 Records of the City of Stamford;

- d. Deed dated September 3, 1891 and recorded at Volume 73, Page 465 of the
 Land Records of the City of Stamford;
- e. Deed dated May 8, 1912 and recorded at Volume 161, Page 305 of the Land Records of the City of Stamford;
- f. Deed dated October 1, 1919 and recorded at Volume 226, Page 556 of the Land Records of the City of Stamford
- 5. Defendant City of Stamford is municipal corporation duly established under the laws of the State of Connecticut.
- 6. The defendant may claim an interest in the Property, or parts thereof, by virtue of, *inter alia*, a map entitled "Urban Redevelopment Commission Parcels 24 & 25" dated November 20, 1979 and recorded as Map No. 10434 of the Land Records of the City of Stamford.
- 7. Specifically, defendant may claim an interest in a strip of land of approximately 159 square feet depicted on Map No. 10434 ("Disputed Parcel")
- 8. As a result of defendant's claims or possible claims of an adverse interest in the Property and the Disputed Parcel, the plaintiff seeks a judgment quieting and settling the title to the Property and the Disputed Parcel in the name of Plaintiff.

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WHEREFORE, THE PLAINTIFF CLAIMS:

- 1. Settlement of title; and
- 2. Any other relief deemed equitable and just under the circumstances.

PLAINTIFF ST. JOHNS ROMAN CATHOLIC CHURCH OF STAMFORD CONNECTICUT

BY:

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Juris No. 403674

Its Attorney

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STATEMENT OF AMOUNT IN DEMAND

The plaintiff is claiming other relief in lieu of money damages.

PLAINTIFF

ST. JOHNS ROMAN CATHOLIC CHURCH OF

STAMFORD CONNECTICUT

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